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17 [Additional Counsel Listed on Signature Page]
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19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 Cung Le, Nathan Quarry, Jon Fitch, Brandon
22 Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
23 others similarly situated,

24 Plaintiffs,

25 v.

26 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

27 Defendant.
28

Case No.: 2:15-cv-01045-RFB-BNW

**ZUFFA, LLC'S MOTION TO SEAL
PLAINTIFFS' EXHIBIT 17 FROM THE
EVIDENTIARY HEARING**

1 On September 12, 2019, during the evidentiary hearing on class certification, Plaintiffs
2 showed a portion of Plaintiffs' Exhibit 17 (PCCX344) to Professor Paul Oyer. ECF No. 741,
3 9/12/19 Hearing Tr. at 5-176:17-25. The only portion of PCCX344 shown during the hearing was
4 the upper-left hand corner of the "Cost of Sales Driver: Athletes" slide on page 60 (ZFL-2677957)
5 of the exhibit, which was limited to the chart showing "Athlete Costs" and "Historical and
6 Projected Athlete Costs (\$ in mm)." *Id.* Zuffa includes an unredacted version of the portion of
7 page 60 of PCCX344 as shown to Professor Oyer as Exhibit A to this motion to seal.
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9 The remaining redacted portions of PCCX344 contain Zuffa's highly sensitive financial
10 information, including trade secret financial projections. Specifically, the redacted portions of the
11 document contain Zuffa's recent actual financials in 2015 and beyond as well as proprietary internal
12 financial projections made by Zuffa. In some cases, these projections go as far as the year 2020.
13 Zuffa considers this information to be highly confidential and sensitive for the reasons stated in
14 Zuffa's previous briefing on this issue and in declarations accompanying those briefs, *see, e.g.*, ECF
15 Nos. 665, 696, 727, 732. As explained and substantiated in those briefs and declarations,
16 compelling reasons exist to seal the information redacted in the document as publicly filed as ECF
17 No. 752-1 (and under seal as ECF No. 753) with the exception of the "Athlete Costs" section of the
18 document on page 60 (ZFL-2677957) attached as Exhibit A.
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1 Dated: October 7, 2019

Respectfully Submitted,

2 BOIES SCHILLER FLEXNER LLP

3 By: /s/ Stacey K. Grigsby

4 Stacey K. Grigsby

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21 *Ultimate Fighting Championship and UFC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Zuffa, LLC's Motion to Seal Plaintiffs' Exhibit 17 from the Evidentiary Hearing was served on October 7, 2019 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Brent K. Nakamura
Brent K. Nakamura